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The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th St SW
Washington, D.C., DC 20536

**Re: Comments on Public Notice –Green Tree School & Service Seeks
Focused Comment on E-Rate Modernization, WC Docket No. 13-184**

Dear Chairman Wheeler:

This is in response to the recent Public Notice seeking Focused Comment on E-rate Modernization.

I agree that the E-rate program must quickly evolve to support the education of our students. To do so the Commission should immediately increase the funding cap to at least \$5.5 billion annually to accommodate 2014 Internal Connections demand. Schools and libraries were denied Priority 2 (P2) Internal Connections and Basic Maintenance of Internal Connections for 2013. It appears from comments made by the Commission that 2014 P2 funding is in danger as well. Not only has action been delayed putting the ConnectEd initiatives' timeline at risk, the E-rate program is not maintaining the equipment it has already purchased. The additional \$1 billion annually that has been proposed is not enough to alleviate the lack of P2 funding. I agree with Commissioner Rosenworcel when she stated "We need to restore what inflation has taken away from this program."

In response to paragraphs 10 & 15 of DA 14-308, I agree that the Commission should change the current priority two funding category (including no longer supporting legacy services that are currently eligible for priority two funding), by allocating annually a set amount of E-rate funds to provide schools and libraries with funding for LANs and Wi-Fi networks, which are essential to ensuring high-capacity broadband reaches students and library patrons. This should occur in conjunction with a new "1 in 5" rule on a per school basis. To adequately fund this category of service will require at least \$3 billion in additional funding annually. The "front-loading" of support while the Commission implements its reforms is imperative.

As Commissioner Pai has said "We should shoot for the moon. And we should aim to win."

Sincerely,

Adam Kegley
Chief Financial Officer